### Dock 93-48 EX PARTE OR LATE FILED NATIONAL COALITION ON TELEVISION VIOLEN

#### **Board of Directors:**

Carole Lieberman, M.D., Psychiatrist NCTV Chairperson Mary Ann Banta, President Washington Assoc, for Television and Children Marilyn Droz, Executive Director Council for Children's Television and Media Robert E. Gould, M.D., Sports Violence Reviewer Psychiatrist, New York Medical College Pat Pulling, Violent Children's Games & Toys Activist Founder, Bothered About Dungeons & Dragons Delores Alexander, Board Member

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March 12, 1993

Women Against Pornography

DOCKET FILE COPY ORIGINAL Ms. Donna Searcy, Secretary Federal Communications Commission 1919 M Street N W Washington, D.C. 20554

Dear Commissioners:

Information and Research Office:

National Coalition on TV Violence P.O. Box 2157 Champaign, IL 61825

Office of National Chairperson:

Carole Lieberman, M.D. National Coalition on TV Violence 247 S. Beverly Drive Beverly Hills, CA 90212 Tel: 310-278-5433

Washington, D.C. Office:

Mary Ann Banta National Coalition on TV Violence 5132 Newport Ave. Bethesda, MD 20816 Tel: 301-986-0362

New York Office:

Robert E. Gould, M.D. National Coalition on TV Violence 144 East End Ave. New York, NY 10128 Tel: 212-535-7275

As Chair of the National Coalition on Television Violence and a media psychiatrist and script consultant, I would like to respond to your request for public comments on how to get television networks to comply with the Children's Television Act of 1990. Although well meaning and certainly a step in the right direction, this Act needs to be more specific in order for networks to understand how to comply. air one or two programs which are geared toward "educating children" and then fill the remaining hours of airwaves with violence -- violent cartoons, violent reality and dramatic programs and violent films -is a travesty.

For over ten years, the National Coalition on Television Violence has been researching the amount of violence in our media. From the research and my own experience, I can attest to the fact that the amount of media violence which we ingest causes children to become agressive, desensitized to violence, anxious and to have nightmares. Thousands of studies have proven this to be true.

In my statement before the House Judiciary Subcommittee on Crime in December of 1992, I outlined a 10-point plan which would require networks/stations/producers to take responsibility for the programs which they air, especially in regard to the amount of violence in programs.

I feel specific guidelines such as these are needed regarding children's programming as well as programming in general and would be pleased to appear at any hearing which you hold on this issue. I can also be available to work as a consultant to your organization or with the television heads to create guidelines to help them comply. Please feel free to contact me at 310/456-2458.

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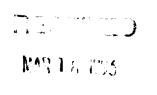
Sincerely, Carole Lieberman, MD, M.P. H. Carole Lieberman, M.D., M.P.H. Chair, N.C.T.V.

CL/pa ENC.

### NATIONAL COALITION ON TELEVISION VIOLENCE

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December 15, 1992

STATEMENT FOR THE HOUSE JUDICIARY COMMITTEE'S SUBCOMMITTEE ON CRIME AND CRIMINAL JUSTICE

Today we are addressing what few recognize as the number one health problem in America: media violence. As a psychiatrist and the Chairperson of the National Coalition on Television Violence, I can tell you that more lives are damaged or destroyed by the effects of on-screen violence than any other medical problem. Our society has become addicted to a new drug, far more dangerous than any street drug we've seen before. This new drug is media violence, and television is selling this drug 24 hours a day in the living rooms and bedrooms of American families. Our addiction to violence on the screen is manifesting itself by violence in our streets in epidemic proportions...and we must do something about it.

The National Coalition on Television Violence, founded in 1980, is the first organization to have made the reduction of glamorized violence on TV its primary objective. The organization has over 3500 members and receives requests daily from

the media and concerned citizens for information regarding the effects of media violence. NCTV conducts its own research and compiles the research of others regarding the effects of violence in: television (from cartoons to prime time) film, books, comics, music videos, war toys, videogames, etc. We have consistently found that violence in each of these media can be shown to have harmful effects approximately 95% of the time. Such harmful effects include: becoming aggressive or violent, becoming desensitized to violence and human suffering, anxiety, nightmares and self-destructive behavior. NCTV publishes a newsletter and sends out press releases to disseminate our findings. NCTV is a non-profit, donor based organization with no political, religious or other biases. Its Board of Directors is made up of psychiatrists, researchers and educators. I am currently in the process of developing an Advisory Board made up of members of the entertainment industry.

I will release today the preliminary results of out most recent research. But first let me give you an example of a study which, as Congressmen, you might find particularly interesting. In 1991, NCTV polled suburban children aged 10 - 13 and found that 66% were able to correctly identify the violent film and TV character Freddy Krueger. Only 36% of these same children, however, knew that Abraham Lincoln was a President of the United States. I assume you would agree that something is wrong with this picture.

Now for the preliminary results of our most resent Prime Time TV Study. Our researchers have found that the Fox TV Network has the highest number of violent acts per hour by an overwhelming margin. Next came NBC and CBS. ABC had a

slightly lower number of violent acts per hour in the prime time shows reviewed. The exact numbers and a list of the most violent TV shows will be released by NCTV later this month.

I speak also as a Psychiatrist, trained here in New York City at N.Y.U.-Bellevue.

I have spent the past 10 years researching the effects of media - including violence - on people's minds. I have a Masters degree in Public Health from U.C.L.A. where I studied while on a Fellowship from the National Institute of Mental Health. I work to educate the public about the effects of media by appearing on, and hosting TV and radio shows, and in print. I also work as a script consultant, helping the entertainment industry portray issues more responsibly. I have seen patients' lives torn asunder by irresponsible television - especially by its glamorization of violence.

As a result of my psychiatric research and experience in the entertainment industry, I strongly urge you now to adopt the following proposal to treat the epidemic of violence, which is sweeping our TV sets and our streets:

NCTV 10 - POINT PLAN TO SWEEP VIOLENCE OFF TV AND OFF OUR STREETS

#### 1. No Censorship

There should be no Governmental censorship of the media. It must be recognized that upholding the separation of government and media (as well as religion and media) is even more vital to the citizens of the United States, than curbing violence.

#### 2. Ratings System for Violence

A ratings system which describes the violent content of TV shows should be agreed upon by the networks and cable channels. Ratings would delineate the quantity of violence (in terms of violent acts per show) and the quality of violence (in terms of how graphic and lethal the violence is, whether the overall message is proor - anti - violence, and how gratuitous the violence is). Ratings would be determined by an independent review board comprised of experts in the field of media violence.

#### 3. <u>Ingredient Labels</u>

Using the precedent of requiring labels on food products which detail the ingredients contained inside, TV shows should be required to broadcast ingredient labels and use them in TV publicity/listings. Such labels would reflect the results of the ratings system: the quantity and quality of the violence contained inside the show.

#### 4. Warning Labels on TV Shows

Using the precedent established for products such as cigarettes, TV shows should be required to flash a warning label before those shows rated high in violence. The warning label should read: "The TV show you are about to watch may be hazardous to your psychological and/or physical health due to its highly violent content."

#### 5. Warning Labels on TV Ads

Commercials for war toys (including, but not limited to: action figures, videogames, guns and other weapons) and other violent-themed products, would need to carry appropriate warning labels. These would read: "The toy you have just seen advertised may be hazardous to the psychological and/or physical health of a child due to its theme which inspires violent play."

#### 6. <u>Violence Advisors On Staff</u>

At least one psychiatrist and/or researcher on TV violence should be on staff at each network and cable channel to review its shows and determine the psychological impact of any violence portrayed. This person would then advise the producers and TV executives of the findings and make recommendations as to how the violence can be toned down without compromising artistic integrity.

#### 7. Public Service Announcements

Networks and cable channels should be strongly advised to carry PSA's which educate viewers about the harmful effects of media violence. Each channel would be advised to carry a number of PSA's per day which would be in proportion to how much violent programming it broadcasts.

### 8. 'Just Say No' in Government Institutions

No violent TV programming should be offered to residents of government institutions - such as jails and psychiatric hospitals. These residents are often exposed to countless hours of TV viewing, while in a condition where they are particularly vulnerable to its effect, instead of receiving more appropriate psychotherapy and rehabilitation. No children residing in government institutions should be exposed to TV violence.

#### 9. Tax Breaks

Tax breaks should be given to networks and cable channels, production companies, foundations, private donors, etc. who provide money to support:

- research and education on the effects of TV violence.
  - development of non-violent TV programming for children.

#### 10. <u>Media Literacy Public Health Campaign</u>

A public health campaign should be launched, in the same spirit as campaigns against drunk driving and against the consumption of alcohol by pregnant women, to promote awareness of the effects of media violence. Schools and TV itself would participate in this campaign to create better educated media consumers. Obviously, safeguards must be built in to disallow government and media sources from promoting self-serving agendas.

In conclusion, TV is polluting the minds of children and adults by its selling of the new drug: violence. Just as we need to address the pollution of our environmental resources, we need to address the pollution of our most precious resource: the minds of American citizens. And we need to address it now.

Carole Lieberman, M.D.

Psychiatrist and Chair, National Coalition on Television Violence

#### About The National Coalition on Television Violence (NCTV)

NCTV, formed in February 1, 1980, is the first and only organization to have the reduction of glamorized violence on TV as its primary objective. The organization has over 3300 members and a board and associated endorsers who are the top aggression researchers/activists in the world. NCTV has been and continues to be a national public health interest (and non-profit, donor based) organization funded by contributions from the public. The main mission has been to focus attention on the harmfulness of glorified violence depicted in the media. Second, spreading the word as to how much violence is on TV is our next objective. Third, NCTV publishes a list of the best and worst shows on television. The rigorous application of a well-researched violence definition to the study of the levels of violence on prime time and Saturday morning programming has been the mainstay of the organization from the inception of NCTV through this current 1991-1992 TV season. The study of prime time and Saturday morning programming has been and continues to be the top priority of the organization. On a few occasions, NCTV increases its level of activism against the most vile TV shows (e.g., Friday the 13th, The Series and Freddy's Nightmares) by contacting, monitoring, and boycotting advertisers and TV stations. NCTV also undertakes the study of violence in other entertainment media, such as films, music videos and video games.

As mentioned above, NCTV uses a set of systematic guidelines to define and clarify those acts which are and are not counted as interpersonal physical violence in the monitoring process. Not only are counts tallied and weighted, the identified violent acts are put into context by analyzing the message presented in the material. The complementary contextual guidelines consider the following pertinent questions for content analysis: 1. Are violent resolutions shown as the only way to solve problems? 2. Do characters succeed through the use of violence? 3. Are harmful consequences of the violence clearly depicted? 4. Are characters portrayed as consistently evil without any good qualities? Finally, NCTV has a number of subsidiary concerns (e.g., glamorized portrayals of alcohol, tobacco, and illicit drug use, and degrading sexual portrayals) are also taken into account (to a lesser degree) when assigning ratings to individual programs.

NCTV supports programming which depicts the harmful consequences of violence, drinking, and smoking. Programs which stress problem resolution through nonviolence, break down divisive stereotypes, promote strong family and social bonding, or contain high educational content are strongly applauded by NCTV. In general, NCTV calls for more and supports existing warm, challenging and thought provoking programming for all ages.

As a non-profit, public educational unit, NCTV persists through the generous support of concerned citizens and organizations.

### Nos Angeles Times

ENTERTAINMENT/THE ARTS/TV LISTINGS

# **CALENDAR**

MONDAY, MAY 25, 1992

# HIGHLIGHTS

DR. CAROLE LIEBERMAN: The 'reel' violence Hollywood manufactures kills "real" people in the streets, the psychiatrist charges. F3

# Counterpunch

Soul-Searching

On Violence

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### Studies Indicate Screen Mayhem Shapes Lives

By DR. CAROLE LIEBERMAN

oul-Searching on Violence by the Industry" (Calendar, May 18) doesn't "search" deeply enough.

What transformed wide-eyed babies into L.A. rioters? Close to 1,000 studies in recent decades would indicate that it was the steady diet of violent media they

ingested from cartoons to video games to slasher films.

If parents cared as much about what children feed their



Lieberman

brains as they do about what they feed their stomachs, they wouldn't abdicate their parental roles to the media. Each generation of children is being increasingly raised by TV sets and movie screens and coming to believe in the values media tout.

We readily accept that children learn the alphabet from "Sesame Street," why can't we accept that they learn the ABCs of murder and mayhem from gratuitously violent entertainment?

Daily, I hear writers, producers and other industry people say, "It's only entertainment!," meaning no one believes or acts upon what they see on-screen. Yet these same people sell product-placement

spots and commercial time for billions of dollars per year. If a 30-second commercial can sell soap, then surely years of glamorized murder, rape and mutilation can sell violence.

Why does Hollywood continue to generate violent entertainment quicker than you can say, "'Kill' the lights, we're ready to 'shoot'"?

- Violence sells. Just like a drug. violence makes people high by stimulating the neuropsychological components of their inborn aggressive drive. If a child is raised in a loving atmosphere, the aggressive drive becomes socialized into normal ambition and competitiveness, but in an atmosphere of graphic media violence, the aggressive drive becomes distorted into real-life violence. And, just like a drug, people need ever-increasing doses to achieve the same high. Violence sells. So does crack cocaine. Does that make it OK?
- With the recession hurting Holly wood pocketbooks more than anticipated, exportation of films and TV shows has taken on greater importance. Consequently, studios have turned to violence even more, since it is translated without words. It's sadly ironic that just as the Cold War ended and we could begin to hope for global peace, America is exporting products that will cause global warfare.
- Individual writers, producers and executives feel overwhelmed by the concept that what they write, produce or choose to air could change the lives of millions

- of people, so they deny the power of their work to avoid a responsibility they often feel ill-equipped to handle.
- All scripts require dramatic conflict but to take that literally and plug in gratuitous violence is laziness. In the rush to create more product, artistry is lost.
- In every creative work, the unconscious minds of the creators are reflected. There is clearly a lot of anger coming from the unconscious minds of Hollywood and being reflected on the screen. At least some of this unconscious anger is generated by the brutal logic Hollywood inflicts upon its own.
- Money, money and more money

The answer is not censorship but the industry is long overdue in taking responsibility for what it feeds society. Whether one argues that "life imitates art" or "art imitates life," it is indisputable that the increasing violence in our streets is paralleling the increasing violence in our media.

Do the riots have to invade the studios and homes of the industry for this awareness to penetrate? This time it was close. How much closer does it need to get before the industry acknowledges that the "reel" violence it manufactures is killing "real" people in the streets?

Lieberman is a media psychiatrist, script consultant and talk-show host based in Beverly Hills. She also chairs the National Coalition on Television Violence.



### HIGHLIGHTS

CAROLE LIEBERMAN: The psychiatrist takes issue with the Motion Picture Assn.'s rating system. What needs to be considered, she says, is the psychological effects of film imagery, and new categories to reflect those concerns. F3

LOS ANGELES TIMES

MONDAY, OCTOBER 1, 1990

# Counterpunch

# A Psychological Approach to Rating Movies

By CAROLE LIEBERMAN

arading by us is Jack Valenti and his Motion Picture Assn. of America rating change: NC-17 (Sept. 27). It's time someone cried out, "The emperor is wearing no clothes!" Right now there seems to be an unconscious collusion between the MPAA and the parents its rating system is allegedly trying to inform. Children are the victims of that unwritten pact.

By continuing to patch up an obsolete muddle of categories (G, PG, PG-13, R, NC-17), the MPAA is pretending to communicate something and parents are pretending to understand that something. Neither gets the picture. The rating system is not

logical, not quantifiable and certainly nót easy to utilize. By perpetrating this charade, the MPAA retains its power and parents remain blissfully



Carole Lieberman

ignorant, as they shirk responsibility to be more involved in their children's viewing choices.

Another reason the MPAA lacks credibility is its overwhelming preoccupation with seeing sex as more threatening than violence. The latest change does not directly address this.

Only in our male-dominated society and entertainment industry would films be rated more harshly br sex, not violence. Men feel more

uncomfortable about sex scenes than violent ones because sex scenes evoke men's unconscious conflicts, including castration anxiety, homophobia, fears of inadequacy and impotence. Violent scenes, on the other hand, enhance men's feelings of power. So whether one wants to attribute it to performance anxiety or testosterone, the male predilection

rating system for years. If the movie industry wants to retain the privilege of self-regulation and stem the dangerous tide of censorship that is menacing any vestiges of creativity left in America, it needs to be more responsible.

for violence has been affecting the

Just as the regulation of air and water shouldn't be turned over without ongoing scrutiny to

industries that pollute these resources, similar scrutiny should be given to the entertainment industry, which affects an even more precious resource-our minds. Unfortunately, the creative freedom of all artists risks extinction because too many have greedily polluted viewers' minds with psychologically destructive imagery. In this era of save the Earth, save the whales fervor, we must begin by saving our minds, and especially our children's minds, from those who would exploit them for personal profit.

To address all of these problems, I propose the following new movie rating system, called MIND (Movies Influence Neuropsychological Development). It focuses on the psychological effects of imagery,

simplifies the categories and removes the bias toward acceptance of violence over sex.

1. Movies should be rated in three categories: Child-Safe, Teen-Safe and Adult-Only.

2. Movies should be rated for the quality and quantity of their sexual content (S) and violent content (V), each on a scale of 0-10, with 10 the most psychologically harmful. Gratuitous acts of sex or violence would count more heavily than those necessary to the artistic integrity of the work.

3. In order to be categorized as Child-Safe, a movie would have to qualify as 0-2 in sexual and violent content ratings. Similarly, content would be rated 0-5 to qualify as Teen-Safe and 0-10 to qualify as Adult-Only.

4. Psychotherapists should make up at least 10% of the rating board to give expert opinion regarding psychologically damaging content.

5. To be rated, a movie would need a psychotherapist script consultant/technical adviser on staff to deal with psychological accuracy and suggest alternatives to psychologically damaging content.

Long ago, Freud discovered that our basic drives are sex and aggression. Today, the movie industry is capitalizing on them to hook audiences and sell popcorn. Now we need a rating system that acknowledges the extraordinary influence movies have on our minds.

Lieberman is a Beverly Hills-based psychiatrist who specializes in the effects of media on society. She has been a script consultant on more than 100 TV and film projects.

### NEWS ANALYSIS What Change in Film Rating System Means X Film Rating Dropped ■ Movies: Adult-tl marketed without t

By JACK MATHEWS TIMES FILM EDITOR

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by three ("XXX!!!) and
the beacon for fans of low
without love, they
President 13 President ...

and Replaced by NC-17

■ Movies: Designation would bar children under 17. Move expected to clear the way for strong adult themes. last 15 years, few distributors—or mainstream movie makers—have attempted to buck the public perception of the X as pornogrameter as we rating warmixture of skeptic.

By DAVID J. FOX TIMES STAFF WRITER

Responding to complaints of un-due censorship from movie makers and film critics, the Motion Picture Assn. of America abolished its X movie rating on Wednesday and replaced it with a new adults-onli-classification.

The MPAA, in a loi-